

# **EPA Superfund Explanation of Significant Differences:**

**HUNTERSTOWN ROAD  
EPA ID: PAD980830897  
OU 01  
STRABAN TOWNSHIP, PA  
08/25/1998**

EXPLANATION OF SIGNIFICANT DIFFERENCES  
HUNTERSTOWN ROAD SUPERFUND SITE

I. INTRODUCTION

Site Name: Hunterstown Road Superfund Site

Site Location: Straban Township, Adams County, Pennsylvania

Lead Agency: U.S. Environmental Protection Agency, Region III ("EPA" or the "Agency")

Support Agency: PA Department of Environmental Protection ("PADEP")

Statement of Purpose

This Explanation of Significant Differences ("ESD") is issued in accordance with Section 117(c) of the Comprehensive Environmental Response, Compensation and Liability Act, as amended ("CERCLA"), and is now a part of the Administrative Record for the Hunterstown Road Superfund Site ("Site"). This document explains significant differences to the remedy selected in the Record of Decision ("ROD") for the Site signed by the EPA Regional Administrator on August 2, 1993. EPA has determined that these changes to the selected remedy are necessary to implement the remedial action in an effective manner. The ROD is attached hereto as Exhibit 1.

II. SUMMARY OF THE SITE HISTORY, SITE CONDITIONS, AND SELECTED REMEDY

The Site is located about 1.5 miles northeast of downtown Gettysburg in Straban Township, Adams County, Pennsylvania. Topography in the area is gently rolling. The Site and surrounding areas are semirural with both farmlands and residences adjacent to the Site. The Site occupies an approximate area of 22 acres, and portions of the Site lie both east and west of Hunterstown Road.

Frederick Shealer, the owner of the Site and the operator of a septic tank cleaning business, disposed of wastes from several companies in six areas at the Site. These areas are Drum Burial Area 1, Drum Burial Area 2, Cornfield Area, Lagoon Area, Stressed Vegetation Area, and the Borrow Area. Fred Shealer disposed of liquid wastes, including solvents and paint sludges in the Lagoon Area. Wallboard containing asbestos, and several drums were disposed in the Borrow Area. Sludges containing toxic metals were sprayed on the cornfields, while they were actively farmed, and drums containing wastes were buried in the two areas referred to as Drum Burial Area 1 and Drum Burial Area 2. Wastes containing very high levels of heavy metals were placed in the Stressed Vegetation Area and this waste is still present at the Site. All areas except the Cornfields and the Stressed Vegetation Areas have had emergency actions completed which removed concentrated wastes.

There are three unnamed tributaries of Rock Creek which flow adjacent to portions of the Site. These are referred to herein as the West Stream, Middle Stream, and East Stream. The West and Middle Streams join just north of Shealer Road, and the East Stream joins the other combined streams approximately 0.2 miles south of Shealer Road.

Ground water near the Site is a class II aquifer and is used by nearby residents for drinking water if they are not in the area served by the public water supply.

Based on the Remedial Investigation, the most significant contaminants for ground water contamination at the Site have been identified as: trichloroethene (TCE), 1,1,1-trichloroethane (TCA), vinyl chloride, 1,1-dichloroethene, 1,1-dichloroethane, and 1,2-dichloroethane. Vinyl chloride, however, has only been detected in wells associated with the Lagoon Area.

Based on the Remedial Investigation, the most significant contaminants for surface soil for the different areas of the Site are as follows:

PRIMARY CONTAMINANTS BY AREA	Borrow Area	Lagoon	Cornfields	Stressed Vegetation
Antimony				X
Barium			X	X
Copper	X	X	X	X
Chromium		X		
Lead	X	X	X	X
Mercury		X	X	X
Vinyl Chloride		X		
1,1 - DCE		X		

The primary contaminants in East Stream sediments are lead, chromium, copper, zinc and barium.

A complete description of the selected remedy as well as EPA's rationale for the decision is presented in the August 2, 1993 ROD which is attached hereto as Exhibit 1. The major components of the selected remedy are:

#### Ground Water

Extraction wells to capture all ground water above a depth of 800 feet contaminated with Volatile Organic Hydrocarbons (VOCs).

Treatment of contaminated ground water by air stripping followed by destruction of contaminants in the air stream using catalytic oxidation.

Discharge of the treated water to an on-Site stream in compliance with NPDES limits.

Deed restrictions prohibiting the use of wells on the Shealer property.

Ground water monitoring, including identification and installation of monitoring wells in the regional ground water discharge area from the Site and residential well sampling.

#### Soils / Sediments

LAGOON AND STRESSED VEGETATION AREAS - Excavation and off-Site treatment of two feet of soil, backfill excavation and installation of a one foot deep soil cover.

CORNFIELDS AND BORROW AREAS - Installation of a one foot deep soil cover over a geotextile and subsequent revegetation to prevent contact with contaminated soils.

DRUM BURIAL AREAS - No additional action (Previous Removal Action Completed)

EXTENDED SOIL COVER - Soil cover extended over contaminated soils between Lagoon Area, Stressed Vegetation Area and East Stream.

EAST and WEST STREAM CONTAMINATED SEDIMENTS - Excavation and off-Site treatment and disposal.

Fencing around soil covers and landscaping along fencing to minimize the visual impact on the community.

#### Surface Water

No Current Action - The Selected Remedial Actions for other media will reduce contaminant levels in streams by preventing migration of contaminants via surface water runoff and ground water discharge.

#### Wetlands

Replace Wetlands Permanently Damaged by Remedial Action and Restore Impacted Wetlands Areas.

### III. DESCRIPTION OF SIGNIFICANT DIFFERENCES

Since the issuance of the ROD, EPA has determined that a procedural change should be made to the remedy set forth in the ROD. This change is identified as a Significant Difference and does not constitute an amendment, as that term is used in 40 C.F.R. §300.435(c)(2)(ii), to the ROD because this change does not fundamentally alter the overall approach intended by the selected remedy for the Site. The Significant Difference between the remedy presented in the ROD and the remedy that will be implemented is discussed below. Except for the specific changes discussed below, all terms of the ROD remain in effect.

For ground water contamination, the ROD states that all of the ground water plumes associated with the Drum Burial Areas and the Lagoon Area with detections of VOC contamination above a depth of 800 feet will be captured and remediated to background levels of contamination, practically defined as no detection of VOCs using EPA Method 524.2 Practical Quantitation Limits. This ground water clean up standard was based on Pennsylvania regulations identified at the time of the ROD. The ROD also states that EPA recognizes that such an attempt may not be successful, and that after the remedial action is implemented and several years of data are collected, EPA, in consultation with the Pennsylvania Department of Environmental Protection ("PADEP"), may revise the cleanup goals for the ground water above a depth of 800 feet. Specifically, the ROD states that such a revision could include the waiver of the Pennsylvania background ground water remediation requirement on the basis that it may be technically impracticable from an engineering perspective. See, Section 121(d)(4)(C) of CERCLA.

EPA has determined that it may be possible to make a determination as to the engineering feasibility and practicability of remediating the aquifer at a depth above 800 feet during remedial design as opposed to after the remedial action has commenced and several years worth of data are collected. Such a determination would be based upon a hydro-geologic investigation conducted during the pre-design phase of the ground water pump and treat remedial design. Therefore, this ESD makes a procedural change to the 1993 ROD which would allow EPA, in consultation with PADEP, to make a "technical impracticability" determination, if appropriate, regarding the clean up goals for ground water prior to commencement of the remedial action.

#### IV. PUBLIC PARTICIPATION

This ESD and the information upon which it is based have been included in the Administrative Record file for this Site. The Administrative Record also includes the ROD and all documents that formed the basis for EPA's selection of the remedy. The Administrative Record is available for public review at the locations listed below:

U.S. EPA, Region III  
1650 Arch Street  
Philadelphia, PA 19103  
Hours: Mon.-Fri., 9:00 am to 4:00 pm

and

Adams County Public Library  
59 East High Street  
Gettysburg, Pennsylvania 17325  
Hours: Mon.-Thu., 9:00 am to 8:30 pm  
Fri.-Sat., 9:00 am to 5:00 pm  
Sun., 1:00 pm to 5:00 pm

Questions and comments on EPA's action and requests to review the Administrative Record can be directed to:

John Banks  
Remedial Project Manager  
Mailcode:(3HS22)  
U.S. EPA, Region III  
1650 Arch Street  
Philadelphia, PA 19103  
(215) 814-3214

#### V. SUPPORT AGENCY REVIEW

The Pennsylvania Department of Environmental Protection has concurred with the proposed Explanation of Significant Differences in a letter dated August 13, 1998.

## VI. AFFIRMATION OF STATUTORY DETERMINATION

Considering the new information that has been developed and the changes that have been made to the scope of the selected remedy, the EPA and PADEP believe that the revised remedy remains protective of human health and the environment, complies with Federal and State requirements that are applicable or relevant and appropriate to this remedial action, and is cost-effective.

In addition, the revised remedy utilizes permanent solutions and alternative treatment (or resource recovery) technologies to the maximum extent practicable for the Site.

<IMG SRC 98045A>